UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Ramiro Martin Collazos a/k/a Ramiro M. BK. NO. 22-01552 MJC

Collazos a/k/a Ramiro Collazos a/k/a Martin Ramiro CHAPTER 13

Collazos

Debtor(s)

MCLP Asset Company, Inc.

Movant

v.

Ramiro Martin Collazos a/k/a Ramiro M. Collazos a/k/a Ramiro Collazos a/k/a Martin Ramiro Collazos

Debtor(s)

And

Jack N. Zaharopoulos

Trustee

ANSWER TO MOTION OF MCLP Asset Company, Inc. FOR RELIEF FROM STAY

AND NOW COMES Debtor, Ramiro Martin Collazos, by and through his attorneys, and in Answer to the Motion of MCLP Asset Company, Inc. for Relief from Stay avers:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 4 and such are therefore denied.
- 5. Denied to the extent the averments of paragraph 5 are other than a statement or conclusion of law or request for relief that does not require a response.
- 6. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 6 and such are therefore denied.

- 7. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 7 and such are therefore denied.
- 8. Denied to the extent the averments of paragraph 8 are other than a statement or conclusion of law or request for relief that does not require a response.
- 9. Denied to the extent the averments of paragraph 9 are other than a statement or conclusion of law or request for relief that does not require a response.
- 10. Denied to the extent the averments of paragraph 10 are other than a statement or conclusion of law or request for relief that does not require a response.

WHEREFORE, Debtor, Ramiro Martin Collazos, respectfully prays this Honorable Court for an Order than the Motion of MCLP Asset Company, Inc. for Relief from Stay be denied.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell

ROBERT J. KIDWELL, Esquire Attorneys for Debtor(s) PO Box 511, 712 Monroe Street Stroudsburg, PA 18360 (570) 421-9090; fax (570) 424-9739 rkidwell@newmanwilliams.com